



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

*Newport News Division*

UNITED STATES OF AMERICA,

v.

CHRISTOPHER SCOTT JONES,

Defendant.

)  
) CRIMINAL NO. 4:23-cr- 32  
)  
)  
) 18 U.S.C. § 2422(b)  
) Coercion and Enticement of a Child  
) (Counts 1, 2, & 3)  
)  
) 18 U.S.C. § 2422(b)  
) Attempted Coercion and Enticement of a Child  
) (Counts 4 & 5)  
)  
) 18 U.S.C. § 2252A(a)(2)  
) Receipt of Child Pornography  
) (Counts 6 & 7)  
)  
) 18 U.S.C. §§ 2253 & 2428  
) Forfeiture

**INDICTMENT**

APRIL 2023 TERM - at Newport News, Virginia

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Coercion and Enticement of a Child)

On or about February 6, 2022, in the Eastern District of Virginia, the defendant, CHRISTOPHER SCOTT JONES, did use facilities and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years—to wit: Jane Doe #1, a sixteen-year-old female at the time of the offense whose true identity is known to the Grand Jury—to engage in any sexual activity for which any person could be charged with a criminal offense, including Section 18.2-374.3 of the Code of Virginia (use of communications systems to facilitate certain offenses involving children).

(In violation of Title 18, United States Code, Section 2422(b)).

COUNT TWO

(Coercion and Enticement of a Child)

On or about February 13, 2022, in the Eastern District of Virginia, the defendant, CHRISTOPHER SCOTT JONES, did use facilities and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years—to wit: Jane Doe #1, a sixteen-year-old female at the time of the offense whose true identity is known to the Grand Jury—to engage in any sexual activity for which any person could be charged with a criminal offense, including Section 18.2-374.3 of the Code of Virginia (use of communications systems to facilitate certain offenses involving children).

(In violation of Title 18, United States Code, Section 2422(b)).

COUNT THREE

(Coercion and Enticement of a Child)

On or about March 4, 2022, in the Eastern District of Virginia, the defendant, CHRISTOPHER SCOTT JONES, did use facilities and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years—to wit: Jane Doe #1, a sixteen-year-old female at the time of the offense whose true identity is known to the Grand Jury—to engage in any sexual activity for which any person could be charged with a criminal offense, including Section 18.2-374.3 of the Code of Virginia (use of communications systems to facilitate certain offenses involving children).

(In violation of Title 18, United States Code, Section 2422(b)).

COUNT FOUR

(Attempted Coercion and Enticement of a Child)

On or about July 13, 2022, in the Eastern District of Virginia, the defendant, CHRISTOPHER SCOTT JONES, did attempt to use facilities and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years—to wit: Jane Doe #2, an individual JONES believed to be an eleven-year-old female at the time of the offense whose true identity is known to the Grand Jury—to engage in any sexual activity for which any person could be charged with a criminal offense, including Section 18.2-374.3 of the Code of Virginia (use of communications systems to facilitate certain offenses involving children), and Section 18.2-370 of the Code of Virginia (taking indecent liberties with children).

(In violation of Title 18, United States Code, Section 2422(b)).

COUNT FIVE

(Attempted Coercion and Enticement of a Child)

On or about July 14, 2022, in the Eastern District of Virginia, the defendant, CHRISTOPHER SCOTT JONES, did attempt to use facilities and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years—to wit: Jane Doe #2, an individual JONES believed to be an eleven-year-old female at the time of the offense whose true identity is known to the Grand Jury—to engage in any sexual activity for which any person could be charged with a criminal offense, including Section 18.2-374.3 of the Code of Virginia (use of communications systems to facilitate certain offenses involving children), and Section 18.2-370 of the Code of Virginia (taking indecent liberties with children).

(In violation of Title 18, United States Code, Section 2422(b)).

COUNT SIX

(Receipt of Child Pornography)

On or about February 7, 2022, in the Eastern District of Virginia and elsewhere, the defendant, CHRISTOPHER SCOTT JONES, knowingly received material containing an image of child pornography as defined by 18 United States Code § 2256(8), to wit: “873F2A7C-41F4-4222-B1F0-4D40B3D69726.HEIC” an image file depicting actual and simulated lascivious exhibition of a nude pubescent juvenile female’s genitals and pubic area, that had been mailed using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1)).

COUNT SEVEN

(Receipt of Child Pornography)

On or about February 22, 2022, in the Eastern District of Virginia and elsewhere, the defendant, CHRISTOPHER SCOTT JONES, knowingly received material containing an image of child pornography as defined by 18 United States Code § 2256(8), to wit: “1FDAA4C5-D9FA-4AAE-9EE6-9AA44A7507A8.HEIC” an image file depicting actual and simulated lascivious exhibition of a nude pubescent juvenile female’s genitals and pubic area, that had been mailed using any means and facility of interstate and foreign commerce shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Section 2252A(a)(2) and(b)(1)).

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is hereby notified that, if convicted of any of the violations alleged in Counts 1 through 5 of this Indictment, the defendant shall forfeit the following property to the United States as part of the sentencing:

- a. Any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the violation; and
- b. Any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the violation.

2. Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is hereby notified that, if convicted of either of the violations alleged in Counts 6 and 7 of this Indictment, the defendant

shall forfeit the following property to the United States as part of the sentencing:

a. Any and all matter which contains child pornography or any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 produced, transported, mailed, shipped, or received in violation of Title 18, United States Code, Section 2251 *et seq.*;

b. Any and all property, real or personal, used or intended to be used to commit or to promote the commission of violations of Title 18, United States Code, Section 2251 *et seq.*, and any property traceable to such property; and

c. Any and all property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the violations of Title 18, United States Code, Section 2251 *et seq.*

3. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

4. The property subject to forfeiture includes, but is not limited to, the following:

- an Apple iPad, S/N: DLXY87EWKC51

(In accordance with Title 18, United States Code, Sections 2253 and 2428).

United States v. Christopher Scott Jones  
Criminal No. 4:23-cr- 32

Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

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FOREPERSON

JESSICA D. ABER  
UNITED STATES ATTORNEY

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